

**VAL MANDEL, P.C.**

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May 11, 2009

VIA ECF

Honorable Ramon E. Reyes  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Vadim Mikhlyn, Inga Mikhlyn and ABC All Consulting, Inc. v. Ana Bove, Polina Dolginov, et al.**  
**Docket No.: 08 CIV. 3367**

Dear Judge Reyes:

We represent the Plaintiffs in this action.

We need the Court's assistance because defendants have simply stopped responding to our communications regarding discovery. Our last three letters to defendants, regarding the scheduling of depositions and substantial gaps in defendants' document production, remain unanswered. Copies of those letters, dated April 22, 2009, April 29, 2009 and May 5, 2009, are included herewith.

We request that Your Honor schedule an in-person or telephone conference to address the issues raised in our unanswered letters to defendants.

Respectfully submitted,

  
Eric Wertheim

EW/da  
Encl.

cc: Boris Kogan, Esq. (via fax)  
Peter L. Berger, Esq. (via fax)